

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	*	CHAPTER 13
TAALIBA QAIYIM	*	BANKRUPTCY NO. 15-15032
	*	
Debtors	*	

ORDER

AND NOW, this day of , 201 , upon
consideration of Specialized Loan Servicing LLC's Motion for
Relief from the Automatic Stay and Debtors' answer thereto, and
after hearing, it is hereby ORDERED and DECREED that;

The Motion of Specialized Loan Servicing LLC for Relief From
The Automatic Stay Under Section 362 is DENIED.

BY THE COURT:

J.

Kenneth G. Harrison, Esquire
Fine Neshaminy Interplex Suite 115
Trevose, PA 19053

William C. Miller, Esquire (Trustee)
P.O. Box 40119
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IN RE:	*	CHAPTER 13
TAALIBA QAIYIM	*	BANKRUPTCY NO. 15-15032
	*	
Debtor	*	

**DEBTORS' ANSWER TO THE MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

Debtor, Taaliba Qaiyim, by and through her attorney, Kenneth G. Harrison, Esquire, respectfully represents as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied as a conclusion of law upon which no responsive pleading is required.
6. Denied. Debtor has made payments for December and January. By way of further answer, Movants' attachment states different months in arrears. Also, Movant has granted a loan modification to Debtor which includes any alleged arrears.
7. Denied. Debtors have no knowledge of who has possession of the Note or any endorsement of the Note.
8. Denied. That amount is Debtor's normal monthly payment.
9. Denied as a conclusion of law upon which no responsive pleading is required.
10. Denied as a conclusion of law upon which no responsive pleading is required.

11. Denied as a conclusion of law upon which no responsive pleading is required.

DEFENSES

1. The Debtor have substantial equity in their property and movant has been afforded adequate protection of its interest.

2. Movant has not shown the irreparable harm necessary to justify lifting of the automatic stay with respect to its foreclosure.

3. If movant is entitled to relief from the stay, the stay should not be terminated and the Court should grant less drastic relief by conditioning or modifying the stay.

WHEREFORE, Debtor, Taaliba Qaiyim, respectfully requests that this Honorable Court deny Movant's Motion for Relief From the Automatic Stay.

Respectfully submitted,

s/s Kenneth G. Harrison
Kenneth G. Harrison, Esquire
Five Neshaminy Interplex Suite 115
Trevose, PA 19053